

Administrative Costs pertaining to Victim Services Projects

Purpose:

A, To clarify Victims of Crime Act (VOCA) Final Rule as it pertains to requests for administrative costs and B, to clarify 2 CFR 200.414 as applied to SCDPS – OHSJP awards under the Victims of Crime Act (VOCA), Violence Against Women Act (VAWA), and State Victims Assistance Program (SVAP) funds.

Federal Authority:

A, Office for Victims of Crime (OVC) Final Rule for VOCA

<https://www.federalregister.gov/documents/2016/07/08/2016-16085/victims-of-crime-act-victim-assistance-program>

B, Executive Office of the President, Office of Management and Budget (OMB) Administrative Requirement, Cost Principles, and Audit Requirements for Federal awards located in Title 2 of the Code of Federal Regulations.

Scope and Affected Entities:

All current and potential subgrantees of Victims of Crime Act (VOCA), Violence Against Women Act (VAWA), and State Victims Assistance Program (SVAP) funds.

POLICY VS 2017-001

I. Policy Statement

To allow subgrantees to take full advantage of changes to the Federal guidelines and VOCA rules, offset the costs of the administration of VOCA projects, increase the effectiveness of the staff that provide direct services to victims, staff who are being supported by administrative staff, and in adherence to the VOCA Final Rule governing the allowable costs for VOCA, the SCDPS – OHSJP now will accept requests for administrative costs with stipulations

II. Procedure

VOCA applications must be submitted via the SCDPS Grants Management Information System (GMIS) by the deadline listed in the solicitation.

A. The original application request may include administrative costs listed in the “Personnel” Category.

1. Only original applications requesting administrative costs at submission will be considered for approval for administrative costs.

2. Administrative costs will not be allowed as a revision to the award.

B. The administrative cost may not exceed 10% of the staff’s salary.

C. The staff providing administrative costs must be listed by position title in the Budget Narrative as explanation of said administrative costs.

D. A staff hire/terminate form must be submitted with the application listing the position title and names of persons holding said titles.

1. Should the person holding the position change during the project year, another staff hire/terminate form must be submitted within ten [10] days of the change

- E. Administrative costs or time for the staff performing duties associated with administrative costs may not include unallowable activities such as lobbying, fund-raising, providing services to perpetrators, assisting with PTI or other interventions that assist perpetrators, attending United Way meetings, or other duties considered unallowable under VOCA rules. Direct charging of these costs may be appropriate only if all of the following conditions are met:
1. services are integral to a project or activity;
 2. individuals involved can be specifically identified with the project or activity;
 3. Individuals will use time and effort sheets;
 4. agency can and will justify the need for administrative support in detail;
 5. costs are explicitly included in the non-federal budget or have the prior written approval of awarding agency; and
 6. costs are not also recovered as indirect costs.
- F. Executive Directors, Board Members, and third-party vendors may not be included in administrative costs.
- G. Administrative costs may not be charged to a project if the agency is operating under a negotiated cost rate or chooses to use the de minimis rate.